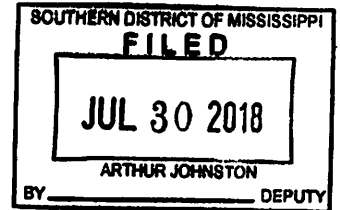


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
Courtroom Division



ROOSEVELT HARRIS

PLAINTIFF

vs.

CIVIL No. 3:18-cv-00059-DPJ-FKB

MURPHY FIL USA, Inc

DEFENDANT

PLAINTIFF'S REPLY TO DEFENDANT'S RESPONSE
TO AMENDED MOTION TO WITHDRAW

COMES NOW, ROOSEVELT HARRIS, PLAINTIFF IN THE ABOVE

CAPTIONED AND NUMBERED CIVIL ACTION WHO FILES THIS HIS PLAINTIFF'S

REPLY TO DEFENDANT'S RESPONSE TO AMENDED MOTION TO

WITHDRAW AND IN SUPPORT THEREOF PLAINTIFF WILL SHOW

UNTO THE HONORABLE COURT THE FOLLOWING TO WIT:

I

THAT ON THE 18TH DAY OF JULY, 2018, PLAINTIFF'S COUNSEL OF
RECORD FILED AN AMENDED MOTION TO WITHDRAW AS COUNSEL

IN THE INSTANT CIVIL ACTION, SUB JUDICE, CITING, INTER ALIA:

"...THAT SAID LEAD COUNSEL DOES NOT BELIEVE THAT
HE CAN CONTINUE TO PROPERLY REPRESENT THE INTEREST
OF THE PLAINTIFF..."

EXHIBIT A PG. (1) OF (2)

II

THAT ON OR ABOUT THE 25TH DAY OF JULY, 2018, PLAINTIFF
RECEIVED VIA U.S. POSTAL SERVICE, DEFENDANT'S RESPONSE TO
COUNSEL'S AMENDED MOTION TO WITHDRAW. (EXHIBIT B).

HARRIS NOW REPLY AS FOLLOWS.

III

IT IS CRYSTAL CLEAR THAT HARRIS'S COUNSEL OF RECORD
HAS TAKEN EVERY LIBERTY TO SABOTAGE PLAINTIFF'S POSITION IN
THE CASE AT BAR. AS TO PARAGRAPH I OF DEFENDANT'S RESPONSE,
PLAINTIFF, WITHOUT WAIVING NOR DIMINISHING ANY RIGHTS
OF FURTHERMENT DEMANDS:

I AM UNABLE TO PROCEED IN A TIMELY MANNER
WITH THE LITIGATION. I REQUEST THE COURT TO GRANT ME
COUNSEL. I HEREBY REQUEST THE HONORABLE COURT TO GRANT ME
A REASONABLE TIME TO ACQUIRE COMPETENT COUNSEL. SHOULD PLAINTIFF
DUE TO HIS PRESENT INCARCERATION NOT BE ABLE TO ACQUIRE SUCH
THEN I RESPECTFULLY MOVE THE HONORABLE COURT TO APPOINT COUNSEL

As to PARAGRAPH II of DEFENDANT'S RESPONSE, PLAINTIFF REPLIES:

HARRIS HAS NO KNOWLEDGE OF ANY SUCH DISCOVERY REQUEST(S)

NOR WHETHER OR NOT RECORD COUNSEL DOES. HOWEVER, HARRIS HAS

ATTEMPTED TO ACQUIRE A COMPLETE COPY OF COUNSEL'S FILE IN THIS CASE.

HARRIS HEREBY REQUESTS THIS HONORABLE COURT TO CO COMPEL

COUNSEL MARYANN SUMMERS (MSB# 6444), 1115 MONROE ST., P.O. BOX

67, VICKSBURG MS. 39183, TO PROVIDE HARRIS WITH A COMPLETE COPY

OF ALL PAPERS IN HIS POSSESSION RECEIVED AND ORIGINATING IN

CIVIL AC. NO. 3:18-CV-00059-DPJ-FKB. As to PARAGRAPH III

WITHIN, EXHIBIT B, PLAINTIFF REPLIES:

AGAIN, HARRIS, HAS NOT BEEN INFORMED OF ANY SUCH

DEADLINES CURRENT NOR OTHERWISE. SUMMERS HAS NOT INFORMED

HARRIS OF THE EXISTENCE OF SUCH. HARRIS, HEREBY MOVES

THIS HONORABLE COURT TO EXTEND ANY SUCH RECORD

EXISTING DEMANDS IN LIGHT OF THIS EVILNESS CRISIS

AND UNTIL COMPETENT COUNSEL HAS APPEARED IN THIS CIVIL

ACTION.

Done this 25 day of July, 2018.

Respectfully Submitted

Roosevelt Harris

M.R. ROOSEVELT HARRIS # 142877

PLAINTIFF

CNRCF

33714 Hwy 35

YARON NJ 09176

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT THE UNDERSIGNED HAS THIS DAY CAUSED

TO BE MAILED VIA U.S. POSTAL SERVICE, POSTAGE PRE-PAY

THE FOREGOING REPLY TO DEFENDANT'S RESPONSE TO AMENDED MOTION TO

WITHDRAW TO:

Hon. SANDRA CAMPBELL
U.S. DISTRICT Ct. CLERK'S OFFICE
U.S. DISTRICT COURT S. DIST. MISS.
501 E COURT ST. RM 2.500
JACKSON MS. 39201

Hon. D. STERLING KIDD
ATTORNEY AT LAW
P.O. BOX 14167
JACKSON MS. 39236

Hon. MARSHALL SANDERS, ESQ.
P.O. BOX 67
VICKSBURG MS. 39183

Done this 26th day of July, 2018.

MR ROOSEVELT HARRIS #142877
PLAINTIFF
CMRCF
33714 HWY 35
VALDEN MS. 39176